

JASON J. CURLIANO [Cal. State Bar 167509]
ONDREJ LIKAR [Cal. State Bar 260199]
BUTY & CURLIANO LLP
516 - 16th Street
Oakland, CA 94612
Tel: 510.267.3000
Fax: 510.267.0117
Email: jcurliano@butycurliano.com
olikar@butycurliano.com

Attorneys for Defendants:
KAISER FOUNDATION HOSPITALS;
THE PERMANENTE MEDICAL GROUP, INC.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO

JAMES PEARSON,

Plaintiff,

v.

KAISER FOUNDATION HOSPITALS;
THE PERMANENTE MEDICAL
GROUP, INC., a Corporation doing
business in the State of California;
COMMONSPIRIT HEALTH, a Colorado
corporation, d/b/a ST. JOSEPH'S
BEHAVIORAL HEALTH; and Does 1
through 20, inclusive

Defendants.

Case No. 2:20-CV-02335-MCE-KJN

**SECOND STIPULATION TO
EXTEND TIME TO RESPOND TO
INITIAL COMPLAINT BY NOT
MORE THAN 28 DAYS (LOCAL
RULE 144(A)) AND ORDER**

Complaint filed on 11/23/20

IT IS HEREBY STIPULATED, by and between plaintiff JAMES PEARSON and
defendants KAISER FOUNDATION HOSPITALS and THE PERMANENTE MEDICAL
GROUP, INC. (referred to herein as "KAISER DEFENDANTS"), through their
undersigned counsel, that the KAISER DEFENDANTS may have up to and including
January 13, 2021 to file a responsive pleading to plaintiff's Complaint. The extension is
necessary to allow the KAISER DEFENDANTS time to obtain information needed to
respond to the Complaint. This is the second stipulation for an extension of time between

the parties. This extension does not exceed the twenty-eight (28) days allowed under Eastern District Local Rule 144(a). Pursuant to Local Rule 144(a), approval of this stipulation by the Court is not necessary.

IT IS SO STIPULATED.

DATED: December 30, 2020

BUTY & CURLIANO LLP

By: /S/ Ondrej Likar
JASON J. CURLIANO
ONDREJ LIKAR
Attorneys for Defendants:
KAISER FOUNDATION HOSPITALS;
THE PERMANENTE MEDICAL GROUP, INC.


DATED: December 30, 2020

ALLACCESS LAW GROUP

By: /S/ Irakli Karbelashvili [as authorized on 12/30/2020]
IRAKLI KARBELASHVILI
Attorneys for Plaintiff:
JAMES PEARSON

IT IS SO ORDERED.

Dated: January 4, 2021


MORRISON C. ENGLAND, JR.
SENIOR UNITED STATES DISTRICT JUDGE